UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	JOHN P. CUPELLI and	:	CHAPTER 13
	ALICE A. CUPELLI	:	
	Debtor(s)	:	
		:	
	CHARLES J. DEHART, III	:	
	STANDING CHAPTER 13 TRUSTEE	:	
	Movant	:	
		:	
	vs.	:	
		:	
	JOHN P. CUPELLI and	:	
	ALICE A. CUPELLI	:	
	Respondent(s)	:	CASE NO. 5-19-bk-00485

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this   29th   day of April, 2019, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1. The Trustee avers that debtor(s)' plan is not feasible based upon the following:

a. Plan ambiguous – 2(c) vs. 2(E)

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

a. Deny confirmation of debtor(s) plan.
b. Dismiss or convert debtor(s) case.
c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Charles J. DeHart, III
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

<u>CERTIFICATE OF SERVICE</u>

AND NOW, this   15th   day of May, 2019, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Mark Conway, Esquire
502 South Blakely Street
Dunmore, PA   18512

/s/Deborah A. Behney
Office of Charles J. DeHart, III
Standing Chapter 13 Trustee